

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
RICHARD ANTHONY LOPEZ
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6336 / Fax: 702.388.6418
tony.lopez@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NAJEEB RAHMAN,

Defendant.

Case No. 2:15-cr-00178-GMN-GWF

**Stipulation to Continue Deadline for
Government's Response to Defendant's
Motion to Modify Conditions of Supervised
Release [ECF 138] (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, counsel for the United States of America, and Daniel Hill, counsel for defendant Najeeb Rahman, that the deadline for the Government's Response to defendant's Motion to Modify Conditions of Supervised Release (ECF 138), currently set for August 22, 2022, be vacated and continued to August 26, 2022.

This Stipulation is entered into for the following reasons:

1. On August 7, 2022, defendant Najeeb Rahman filed his Motion to Modify Conditions of Supervised Release. ECF 138.
2. On August 8, 2022, the Court ordered the Government to file its response by August 22, 2022. ECF 139.

1 3. Government counsel has been out of the District since August 13, 2022, and will
2 not return until August 25, 2022. Counsel needs additional time to complete his
3 response to the defendants' motion.

4 4. This continuance is not sought for purposes of delay, but to provide the
5 Government the necessary time to file an appropriate response.

6 5. For the reasons stated above, the ends of justice would best be served by a
7 continuance of the deadline.

8 6. Defendant Rahman is out of custody and does not object to the request for
9 continuance.

10 7. This is the first request for a continuance.

11 DATED this 22nd day of August, 2022.

12 Respectfully submitted,

13 HILL LAW FIRM

14 /s/ Daniel Hill

15 DANIEL HILL

16 Counsel for Defendant Najeeb Rahman

JASON M. FRIERSON

United States Attorney

/s/ Richard Anthony Lopez

RICHARD ANTHONY LOPEZ

Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 NAJEEB RAHMAN,

7 Defendant.

Case No. 2:15-cr-00178-GMN-GWF

**Order on Stipulation to Continue Deadline for
Government's Response to Defendant's
Motion to Modify Conditions of Supervised
Release [ECF 138] (First Request)**

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9 Based on the parties' stipulation to continue the deadline for the Government's
10 Response to defendant's Motion to Modify Conditions of Supervised Release, and good cause
11 appearing therefore, the Court hereby finds that:

- 12 1. On August 7, 2022, defendant Najeeb Rahman filed his Motion to Modify
13 Conditions of Supervised Release. ECF 138.
- 14 2. On August 8, 2022, the Court ordered the Government to file its response by
15 August 22, 2022. ECF 139.
- 16 3. Government counsel has been out of the District since August 13, 2022, and will
17 not return until August 25, 2022. Counsel needs additional time to complete his
18 response to the defendants' motion.
- 19 4. This continuance is not sought for purposes of delay, but to provide the
20 Government the necessary time to file an appropriate response.
- 21 5. For the reasons stated above, the ends of justice would best be served by a
22 continuance of the deadline.
- 23 6. Defendant Rahman is out of custody and does not object to the request for
24 continuance.

1 7. This is the first request for a continuance.

2 **ORDER**

3 **IT IS HEREBY ORDERED** that the deadline for the Government's Response to
4 defendant's Motion to Modify Conditions of Supervised Release, currently set for August 22,
5 2022, be vacated and continued to August 26, 2022.

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7 DATED this 23 day of August, 2022.

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12 HON. GLORIA M. NAVARRO
13 UNITED STATES DISTRICT JUDGE
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